

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

_____	)	
UNITED STATES OF AMERICA	)	
	)	
	)	
V.	)	NO. 09-CR-10017-GAO
	)	
	)	
TAREK MEHANNA	)	
_____	)	

**DEFENDANT'S REQUEST FOR SPECIAL VERDICT FORM**

The defendant, Tarek Mehanna, moves that the Court  
use the appended special verdict form.

TAREK MEHANNA  
By his attorneys,

CARNEY & BASSIL

/S/ J. W. Carney, Jr.  
J. W. Carney, Jr.  
B.B.O. # 074760

/S/ Janice Bassil  
Janice Bassil  
B.B.O. # 033100

Sejal H. Patel  
B.B.O. # 662259  
Steven R. Morrison  
B.B.O. # 669533  
John E. Oh  
B.B.O. # 675916  
Carney & Bassil  
20 Park Plaza, Suite 1405  
Boston, MA 02116  
617-338-5566

Dated: December 14, 2011

Certificate of Service

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on or before the above date.

/S/ J. W. Carney, Jr.  
J. W. Carney, Jr.

SPECIAL VERDICT FORM

COUNT ONE: Conspiracy to Provide Material Support or  
Resources to a Designated Foreign Terrorist Organization

Section I. CONDUCT

Instructions: Answer "YES" or "NO" as to whether the  
Jury unanimously finds that the Government has proven  
beyond a reasonable doubt:

- A. That the defendant, TAREK MEHANNA, conspired to  
provide material support, which consisted of  
travelling to Yemen to attend a terrorist  
training camp with the intent that he would then  
enter Iraq, and join with others to fight and  
kill United States nationals?

YES \_\_\_\_\_

NO \_\_\_\_\_

- B. That the defendant, TAREK MEHANNA, conspired to  
provide material support, which consisted of  
translating videos and/or texts, disseminating  
videos and/or texts to other people, advocating  
to other people certain views?

YES \_\_\_\_\_

NO \_\_\_\_\_

**Section II. FINAL DECISION AS TO COUNT ONE**

**Instructions:** Answer Section II(A) only if the Jury answered "NO" to all of the questions in Section I. Answer Section II(B) if the Jury found that the defendant engaged in at least one of the conspiracies in Section I.

**A. DEFENDANT IS NOT GUILTY**

We, the Jury, find as to Count One, that the Government has not proven, beyond a reasonable doubt, the existence of any conspiracy of which the defendant, TAREK MEHANNA, was a part to provide material support to a designated foreign terrorist organization.

---

FOREPERSON (Signature & Juror Number)

Date: \_\_\_\_\_, 2011

**B. DEFENDANT IS GUILTY**

We, the Jury, find as to Count One, that the Government has proven, beyond a reasonable doubt, the existence of a conspiracy of which the defendant, TAREK MEHANNA, was a part to provide material support to a designated foreign terrorist organization.

---

FOREPERSON (Signature & Juror Number)

Date: \_\_\_\_\_, 2011

**COUNT TWO: Conspiracy to Provide Material Support to Terrorists**

**Section I. CONDUCT**

**Instructions:** Answer "YES" or "NO" as to whether the Jury unanimously finds that the Government has proven beyond a reasonable doubt:

- A. That the defendant, TAREK MEHANNA, conspired to provide material support, which consisted of travelling to Yemen to attend a terrorist training camp with the intent that he would then enter Iraq, and join with others to fight and kill United States nationals?

YES \_\_\_\_\_

NO \_\_\_\_\_

- B. That the defendant, TAREK MEHANNA, conspired to provide material support, which consisted of translating videos and/or texts, disseminating videos and/or texts to other people, advocating to other people certain views?

YES \_\_\_\_\_

NO \_\_\_\_\_

**Section II. FINAL DECISION AS TO COUNT TWO**

**Instructions:** Answer Section II(A) only if the Jury answered "NO" to all of the questions in Section I. Answer Section II(B) if the Jury found that the defendant engaged in at least one of the conspiracies in Section I.

**A. DEFENDANT IS NOT GUILTY**

We, the Jury, find as to Count Two, that the Government has not proven, beyond a reasonable doubt, the existence of any conspiracy of which the defendant, TAREK MEHANNA, was a part to provide material support to a designated foreign terrorist organization.

---

FOREPERSON (Signature & Juror Number)

Date: \_\_\_\_\_, 2011

**Instructions:** Go directly to Section III to Certify this decision.

**B. DEFENDANT IS GUILTY**

We, the Jury, find as to Count Two, that the Government has proven, beyond a reasonable doubt, the existence of a conspiracy of which the defendant, TAREK MEHANNA, was a part to provide material support to a designated foreign terrorist organization.

---

FOREPERSON (Signature & Juror Number)

Date: \_\_\_\_\_, 2011

**COUNT THREE: Providing and Attempting to Provide Material Support to Terrorists**

**Section I. CONDUCT**

**Instructions:** Answer "YES" or "NO" as to whether the Jury unanimously finds that the Government has proven beyond a reasonable doubt:

- A. That the defendant, TAREK MEHANNA, provided material support, which consisted of travelling to Yemen to attend a terrorist training camp with the intent that he would then enter Iraq, and join with others to fight and kill United States nationals?

YES \_\_\_\_\_

NO \_\_\_\_\_

- B. That the defendant, TAREK MEHANNA, conspired to provide material support, which consisted of translating videos and/or texts, disseminating videos and/or texts to other people, advocating to other people certain views?

YES \_\_\_\_\_

NO \_\_\_\_\_

**Section II. FINAL DECISION AS TO COUNT THREE**

**Instructions:** Answer Section II(A) only if the Jury answered "NO" to all of the questions in Section I. Answer Section II(B) if the Jury found that the defendant provided or attempted to provide material support in at least one way in Section I.

**A. DEFENDANT IS NOT GUILTY**

We, the Jury, find as to Count Three, that the Government has not proven, beyond a reasonable doubt, that the defendant, TAREK MEHANNA, provided or attempted to provide material support to a designated foreign terrorist organization.

---

FOREPERSON (Signature & Juror Number)

Date: \_\_\_\_\_, 2011

**B. DEFENDANT IS GUILTY**

We, the Jury, find as to Count Three, that the Government has proven, beyond a reasonable doubt, that the defendant, TAREK MEHANNA, provided or attempted to provide material support to a designated foreign terrorist organization.

---

FOREPERSON (Signature & Juror Number)

Date: \_\_\_\_\_, 2011